

**FILED**  
Clerk  
District Court

**AUG 15 2005**

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

**DAVID G. BANES, Esq.**  
**O'Connor Berman Dotts & Banes**  
**Second Floor, Nauru Building**  
**P.O. Box 501969**  
**Saipan, MP96950**  
**Telephone No. (670) 234-5684**  
**Facsimile No. (670) 234-5683**

**Attorneys for Plaintiffs Elenita A. Santos and Angel C. Santos**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

**ELENITA A. SANTOS and**  
**ANGEL C. SANTOS,**

**Plaintiffs,**

**vs.**

**HONGKONG ENTERTAINMENT**  
**(OVERSEAS) INVESTMENTS LIMITED**  
**dba TINIAN DYNASTY HOTEL &**  
**CASINO, and CENTURY INSURANCE**  
**CO. LIMITED,**

**Defendants.**

**) CIVIL CASE NO. 04-0030**

**)**  
**)**  
**) PLAINTIFFS' EXPERT WITNESS**  
**) DISCLOSURE**

Plaintiffs Elenita A. Santos and Angel C. Santos, by and through counsel and pursuant to Fed.R.Civ.P. 26(a)(2), provides the following disclosure setting forth information about the people whose expert opinions Plaintiffs may offer in evidence at trial.

1) Benchmark Medical Consultants by and through John L. Chase, M.D., F.A.C.S.

a. 10423 Old Placerville Road  
Suite 100  
Sacramento, CA 95827  
Tel: (916) 920-2272  
Fax: (916) 920-2515

**ORIGINAL**

- 1                   b. The report prepared by Dr. Chase and attached hereto as  
2                   "Exhibit A" contains a complete statement of all opinions to be  
3                   expressed. The basis and reasons therefore, the data or other  
4                   information considered by Dr. Chase in forming his opinions  
5                   and any exhibits to be used as a summary of or support for his  
6                   opinions are contained in the medical records of Mrs. Santos,  
7                   copies of which have previously been provided to Defendants.  
8  
9                   c. The curriculum vitae and schedule of fees of Dr. Chase,  
10                  attached hereto as "Exhibit B" contains Dr. Chase's  
11                  qualifications, including a list of all publications authored by  
12                  him within the preceding ten years, the compensation to be  
13                  paid for the study and testimony and a listing of any other  
14                  cases in which Dr. Chase has testified as an expert at trial or by  
15                  deposition within the preceding four years.

16                  2)     Pamina J. Hofer, Ph.D.

- 17                  a.     P.O. Box 5208  
18                         University of Guam Station  
19                         Mangilao, GU 96923  
20                         Tel: (671) 734-0832  
21                         Fax: (671) 734-0393  
22  
23                  b.     The report prepared by Dr. Hofer and attached hereto as  
24                         "Exhibit C" contains a complete statement of all opinions to be  
25                         expressed, the basis and reasons therefore, the data or other  
26                         information considered by Dr. Hofer in forming her opinions  
27                         and any exhibits to be used as a summary of or support for his  
28                         opinions.  
29  
30                  c.     The curriculum vitae and schedule of fees of Dr. Hofer,  
31                         attached hereto as "Exhibit D" contains Dr. Hofer's  
32                         qualifications, including a list of all publications authored by  
33                         her within the preceding ten years, the compensation to be paid  
34                         for the study and testimony and a listing of any other cases in  
35                         which Dr. Hofer has testified as an expert at trial or by  
36                         deposition within the preceding four years.

37                  3)     Marc A. Firestone, Ph.D.

- 38                  a.     300 Esplanade Drive  
39                         Suite 1180  
40                         Oxnard, CA 93096  
41                         Tel: (805) 308-7123

1 b. The report prepared by Dr. Firestone and attached hereto as  
2 "Exhibit E" contains a complete statement of all opinions to be  
3 expressed, the basis and reasons therefore, the data or other  
4 information considered by Dr. Firestone in forming his  
5 opinions, the compensation to be paid for the study, any  
6 exhibits to be used as a summary of or support for his opinions  
7 Dr. Firestone's qualifications, including a list of all  
8 publications authored by him within the preceding ten years  
9 and testimony and a listing of any other cases in which Dr.  
10 Firestone has testified as an expert at trial or by deposition  
11 within the preceding four years.

12 c. The curriculum vitae of Dr. Firestone, attached hereto as  
13 "Exhibit F" contains Dr. Firestone's qualifications.

14 4) Grant Thornton, by and through Roger D. Slater, MBA, CPA

15 a. Dhonson Plaza, Suite B  
16 790 Marine Corps. Drive  
17 Tamuning, GU 96913  
18 Tel: (671) 649-3800  
19 Fax: (671) 687-6711

20 b. Mr. Slater will be asked to testify as to the economic impact to  
21 Mrs. Santos caused by future medical treatment, the nature and  
22 extent of which has yet to be determined.

23 c. The curriculum vitae and schedule of fees of Mr. Slater,  
24 attached hereto as "Exhibit G" contains Mr. Slater's  
25 qualifications, including a list of all publications authored by  
26 him within the preceding ten years, the compensation to be  
27 paid for the study and testimony and a listing of any other  
28 cases in which Mr. Slater has testified as an expert at trial or by  
deposition within the preceding four years.

5) Any and all individuals designated as experts by any other party, notwithstanding  
that subsequent to such designation, any such party may be dismissed from the case and/or  
withdraws such person's designation.

6) Plaintiffs reserve all of its rights pursuant to Fed.R.Civ.P.26 and under the laws  
of the Commonwealth of the Northern Mariana Islands to supplement, revise or withdraw or add

1 hereto especially as Plaintiffs have yet to depose Defendants or see Defendants' proposed  
2 experts.

3  
4 Since discovery in this action has not yet been completed and depositions of experts have  
5 not yet been taken or completed, Plaintiffs expressly reserve the right to name or call additional  
6 experts as the need arises during the course of discovery and investigation in preparation for trial  
7 of this matter, and after Defendants disclose their experts and theories and the facts upon which  
8 they base such theories.

9  
10  
11 Timely notice of such supplemental experts will be provided pursuant to Fed.R.Civ.P. 26  
12 and such witnesses will be made available for the purpose of being deposed prior to trial in this  
13 action.

14  
15 Plaintiffs further reserve the right to consult with and retain the services of additional  
16 expert witnesses to testify on their behalf at trial for the purposes of impeachment and/or  
17 rebuttal testimony.  
18

19  
20 Dated: August 15, 2005.

O'CONNOR BERMAN DOTTS & BANES

21  
22 Attorney for Plaintiffs Elenita A. Santos and  
23 Angel C. Santos

24  
25  
26 By: 

27 David G. Banes  
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